October 3, 1997

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## **MEMORANDUM**

SUBJECT:

Background for DuCoa Facility Soil Samples

FROM:

Robert B. Dona

Environmental Engineer, ROAO

THRU:

Ernest A. Arnold

Regional QA Manager

A 118951



118951 SUPERFUND RECORDS

TO:

Alan Wehmeyer

Deputy Division Director, ENSV

Three soil samples from the DuCoa facility (former Syntex facility), Verona, Missouri, were delivered to ENSV/LABO on Monday, September 29, 1997 by Ron McCutcheon. An ASR signed by Steven Sanders, MOKS/SUPR, accompanied the samples and requested analysis for total PCBs and 2,3,7,8-TCDD and 16 substituted dioxin/furan congeners for each sample.

On Tuesday, 9/30/97, I called Steve Sanders about the samples and the lack of a QAPP that related to them. Steve said that the purpose of the samples was to determine whether the dioxin found at Lamar Drive, Ellisville, Missouri, could be traced to the Syntex facility. As the enforcement agreement with Syntex only stipulated that PCB samples could be collected or split from the Syntex facility, the QAPP for sampling at the Verona facility did not address dioxin analysis. The QAPP for sampling at Syntex, dated May 1995, was reviewed by Doug Brune in July 1995 and comments were sent to Steve Sanders. We received a revised QAPP in November 1995 and Doug responded with thirteen comments on November 22, 1995. Steve Sanders told me that he did not pursue further revisions per our comments as he did not anticipate any sampling at the Verona facility.

As the three soil samples from DuCoa were related to the Lamar Drive site, I suggested to Steve that he send the QA Office an addendum to the Lamar Drive QAPP which had been approved by the RQAM on August 15, 1997 and complete the Syntex facility QAPP by responding to our comments of November 1995 so as to cover the PCB analysis. The addendum should expand the scope of the Lamar Drive investigation to include the sampling at the DuCoa facility. Steve said he would follow up on these QAPPs and Nicole Roblez would hold the samples pending the approval of the Syntex QAPP and the Lamar Drive addendum.

Late on Thursday afternoon, October 2, Bob Feild left me a voice message requesting analysis of the samples without further QAPPs as they needed the data immediately or preferably last week.

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NOTE: See Back For Levels Of Interest (Revised July '92)